

TAMARA BEATTY PETERSON, ESQ., Bar No. 5218  
tpeterson@petersonbaker.com  
NIKKI L. BAKER, ESQ., Bar No. 6562  
nbaker@petersonbaker.com  
PETERSON BAKER, PLLC  
701 S. 7th Street  
Las Vegas, NV 89101  
Telephone: 702.786.1001  
Facsimile: 702.786.1002

*Attorneys for Defendant Stephen Alan Wynn*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on  
behalf of herself and all others similarly  
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;  
MAURICE WOODEN, an individual,  
WYNN LAS VEGAS, LLC dba WYNN  
LAS VEGAS a Nevada Limited Liability,  
WYNN RESORTS, LTD, a Nevada Limited  
Liability Company; and DOES 1-20,  
inclusive; ROE CORPORATIONS 1-20,  
inclusive,

Defendants.

Case No.: 2:19-cv-02159-JCM-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANT STEPHEN ALAN WYNN  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(FIRST REQUEST)**

Defendant Stephen Alan Wynn ("Mr. Wynn"), by and through his counsel of record, the law firm of Peterson Baker, PLLC, and Plaintiff Brenna Schrader ("Plaintiff"), by and through her counsel of record, the Richard Harris Law Firm, hereby agree and stipulate, subject to the Court's approval, as follows:

1. Plaintiff filed her Class Action Complaint for Damages ("Complaint") in the Eighth Judicial District Court, Clark County, Nevada on September 26, 2019.

2. Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. removed the action to this Court on December 16, 2019. *See* Notice to Federal Court of Removal of Civil Action from State Court (ECF No. 1).

1           3.       Prior to removal, Plaintiff attempted to serve Mr. Wynn on or about December 11,  
2       2019, with a copy of the Complaint and Summons issued by the state court on or about September  
3       27, 2019. An affidavit of service was filed as to that attempt.

4           4.       Mr. Wynn has not waived any issues regarding defective and/or insufficient service  
5       of process in connection with the events that occurred on or about December 11, 2019, and has  
6       reserved the right to file a motion to dismiss upon this basis.

7           5.       However, by email dated December 12, 2019, Mr. Wynn's counsel offered to accept  
8       service of the Summons and Complaint.

9           6.       Pursuant to Fed. R. Civ. P. 81, Mr. Wynn's response to the Complaint would be due  
10      21 days following execution of an Acceptance of Service, whenever executed, or at the earliest, 21  
11      days from the date of attempted service on December 11, 2019, or January 2, 2020.

12          7.       In light of the foregoing, both Plaintiff and Mr. Wynn agree that in order to promote  
13      the just, speedy, and inexpensive determination of this proceeding, it is necessary for a date certain  
14      for Mr. Wynn's answer or other response to the Complaint.

15          8.       Further, due to the class and collective claims alleged in the Complaint, Mr. Wynn  
16      requires additional time to investigate Plaintiff's allegations before responding to the Complaint.

17          9.       So there is no ambiguity, the parties have agreed to extend any deadline for Mr.  
18      Wynn to file an answer or other response to the Complaint [ECF No. 1-1] from January 2, 2020 to  
19      and including February 3, 2020.

20          10.      This is the first request for an extension of time for Mr. Wynn to file an answer or  
21      other response to Plaintiff's Complaint.

22          11.      This request is made in good faith and not for the purpose of delay.

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12. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 2<sup>nd</sup> of January, 2020.

Respectfully submitted,

**PETERSON BAKER, PLLC**

**RICHARD HARRIS LAW FIRM**

By: /s/ Tamara Beatty Peterson  
TAMARA BEATTY PETERSON, ESQ.  
Nevada Bar No. 5218  
tpeterson@petersonbaker.com  
NIKKI L. BAKER, ESQ.  
Nevada Bar No. 6562  
nbaker@petersonbaker.com  
701 S. 7th Street  
Las Vegas, NV 89101  
Telephone: 702.786.1001  
Facsimile: 702.786.1002  
*Attorneys for Defendant Stephen Alan Wynn*

By: /s/ Burke Huber  
RICHARD HARRIS, ESQ.  
Nevada Bar No. 505  
BENJAMIN CLOWARD, ESQ.  
Nevada Bar No. 11087  
BURKE HUBER, ESQ.  
Nevada Bar No. 10902  
801 S. Fourth Street  
Henderson, Nevada 89101  
Telephone: 702.444.4444  
Facsimile: 702.444.4455  
*Attorneys for Plaintiff Brenna Schrader*

**ORDER**

IT IS SO ORDERED.

DATED: 1/3/20 \_\_\_\_\_



UNITED STATES MAGISTRATE JUDGE